

March 31, 2004 letter regarding Special Conferences held on February 25, 2003, October 16, 2002, May 13, 2003, October 30, 2003, December 4, 2003, December 10, 2003, December 12, 2003 and January 9, 2004

January 27, 2005 – Official letter of Reprimand.

February 15, 2005 – Professional Development and Appraisal System – Observation Summary

February 18, 2005 – Non-compliance with directives

February 22, 2005 – Professional communication and compliance with campus expectations.

March 3, 2005 - Summary of Conference concerning failure rate.

March 21, 2005 – Summary of Conference concerning failure rate and classroom activities.

April 25, 2005 – Non-compliance with directives.

Additionally, please see documents already in Plaintiff's possession for information responsive to this Interrogatory. Otherwise, documents responsive to this Interrogatory may be included in Plaintiff's personnel file which is attached to Defendant's Response to Plaintiff's Request for Production.

INTERROGATORY NO. 23: Describe the process by which your employees can air complaints, voice concerns or report violations of state or federal statutes whenever an employee has observed same during the course of the employee's employment with you.

ANSWER: Defendant objects to this Interrogatory insofar as the documents requested are equally accessible to Plaintiff, and the burden of obtaining same is not significantly greater for Defendant than Plaintiff.

Subject to and without waiving the above and foregoing objections, Defendant refers Plaintiff to www.judsonisd.org to download the information responsive to this Interrogatory.

INTERROGATORY NO. 24: Identify all persons involved in the decision not to promote/to terminate Plaintiff.

ANSWER: Please see documents already in Plaintiff's possession for information responsive to this Interrogatory. Otherwise, documents responsive to this Interrogatory may be included in Plaintiff's personnel file which is attached to Defendant's Response to Plaintiff's Request for Production.

INTERROGATORY NO. 25: Please state the number of, and describe with particularity, all written or oral student/parent complaints concerning Plaintiff, Ms. Garrett and other employees of Woodlake Hills Middle School that have been transferred to other schools.

ANSWER: Defendant objects to this Interrogatory insofar as it is overly broad and/or unduly burdensome. Defendant further objects to this Interrogatory on the grounds that it excessively invades its employees' right to privacy and other personal, property, and constitutional rights and violates state and federal laws and regulations, including the Texas and United States Constitutions regarding disclosure of employment and medical records and could subject Defendant to liability for disclosure of said information or documents without the specific written authority of each individual. Defendant further objects to this Interrogatory as it invades legitimate privacy interests.

Defendant further objects to this Interrogatory insofar as it is outside the scope of Federal Rules of Civil Procedure 26(b)(1) and are subject to exclusionary rules of evidence.

Subject to and without waiving the above and foregoing objections, Defendant refers Plaintiff to documents produced to Plaintiff in the TWC and/or EEOC hearings previously held in connection with the above styled and numbered cause in regards written or oral student/parents complaints concerning Plaintiff. Also, please see Plaintiff's personnel file which is attached to Defendant's Response to Plaintiff's Request for Production

INTERROGATORY NO. 26: Please state the names, addresses and job titles of all persons who investigated Plaintiff's claims of age, race, nationality, sex or gender discrimination; whistle blowing, wrongful discharge or unfair labor or employment practices.

ANSWER: Defendant objects to this Interrogatory in that it exceeds the number of Interrogatories allowed by Rule 33 of the Federal Rules of Civil Procedure.

INTERROGATORY NO. 27: State and explain, with particularity, all facts, proof or evidence which, in whole or in part, forms the basis of Defendants' contentions regarding the damages alleged by the Plaintiff, including but not limited to, identification of specific amounts of damages alleged by the Plaintiff that you challenge or dispute.

ANSWER: Defendant objects to this Interrogatory in that it exceeds the number of Interrogatories allowed by Rule 33 of the Federal Rules of Civil Procedure.

INTERROGATORY NO. 28: Identify all agreements and/or contracts, including modifications thereof, between Plaintiff and JISD, including, but not limited to, the date of any such agreement, contract or modification, the terms of any such agreement, contract or modification, and all parties to such agreement, contract or modification.

ANSWER: Defendant objects to this Interrogatory in that it exceeds the number of Interrogatories allowed by Rule 33 of the Federal Rules of Civil Procedure.

INTERROGATORY NO. 29: Identify all facts, proof or evidence concerning the reasons that Plaintiff's employment with you ended.

ANSWER: Defendant objects to this Interrogatory in that it exceeds the number of Interrogatories allowed by Rule 33 of the Federal Rules of Civil Procedure.

INTERROGATORY NO. 30: If you contend that the Plaintiff has failed to mitigate her damages, please identify all facts, proof or evidence on which you base this contention including any job offers that you claim the Plaintiff received that Plaintiff should have accepted.

ANSWER: Defendant objects to this Interrogatory in that it exceeds the number of Interrogatories allowed by Rule 33 of the Federal Rules of Civil Procedure.

INTERROGATORY NO. 31: What do you contend are the Plaintiff's reasonable and necessary attorney's fees for prosecuting this lawsuit?

ANSWER: Defendant objects to this Interrogatory in that it exceeds the number of Interrogatories allowed by Rule 33 of the Federal Rules of Civil Procedure.

INTERROGATORY NO. 32: Please identify each and every allegation in Plaintiff's Petition/Complaint filed in this lawsuit which you assert is false or inaccurate, and detail specifically all facts, proof or evidence you claim prove such allegation is false or inaccurate, and identify the true or accurate facts which demonstrate the falsity or inaccuracy of such allegations.

ANSWER: Defendant objects to this Interrogatory in that it exceeds the number of Interrogatories allowed by Rule 33 of the Federal Rules of Civil Procedure.

INTERROGATORY NO. 33: If you contend that Plaintiff has been convicted of any crime or offense that is admissible into evidence, please identify all said crimes or offenses.

ANSWER: Defendant objects to this Interrogatory in that it exceeds the number of Interrogatories allowed by Rule 33 of the Federal Rules of Civil Procedure.

VERIFICATION

STATE OF TEXAS §
 §
COUNTY OF BEXAR §

BEFORE ME, the undersigned authority on this day personally appeared **Dr. Edward Lyman**, Authorized Representative for JUDSON INDEPENDENT SCHOOL DISTRICT, Defendant in the above styled and numbered cause and who, being by me duly sworn stated upon on his oath, that he is over the age of 18 years, is competent to make an oath, that he has read the above and foregoing instrument and that all facts and matters stated there in are true and correct to the best of his knowledge.

JUDSON INDEPENDENT SCHOOL DISTRICT

Edward Lyman
Dr. Edward Lyman, Affiant and
Authorized Representative

SUBSCRIBED AND SWORN TO before me on this 29th day of December 2006, to certify which witness my hand and seal of office.

Linda K. Phillips
NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS
Linda K. Phillips
Typed or Printed Name

My Commission expires: 10-31-2010

